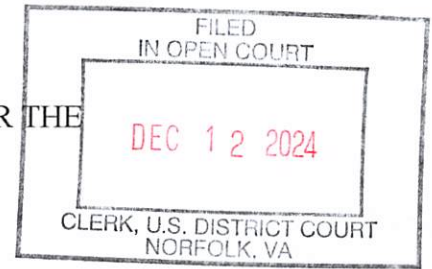


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

DREXEL VENERO,

Defendant.

Case No. 2:24cr122

STATEMENT OF FACTS

The United States and the defendant, DREXEL VENERO (hereinafter, VENERO or “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. Beginning on an unknown date but no later than June 2021, and continuing through in or about July 2022, in the Eastern District of Virginia and elsewhere, defendant DREXEL VENERO, together with others known and unknown, did unlawfully and knowingly combine, confederate, conspire, and agree to commit the following offenses against the United States:

- a. Creation of Animal Crush Videos: knowingly created at least one animal crush video, as that term is defined in Title 18, United States Code, Section 48(f)(2), and intended and had reason to know that the animal crush video would be distributed in and using a means and facility of interstate and foreign commerce, and the animal crush video was distributed in and using a means and facility of interstate and foreign commerce.
- b. Distribution of Animal Crush Videos: knowingly sold, marketed, advertised, exchanged, and distributed an animal crush video in and using a means and facility of interstate and foreign commerce.

Handwritten initials: "BJ" and "DAV" in blue ink.

THE OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was for the conspirators to promote, create, obtain, and distribute animal crush videos using videographers and animals in other countries, to include Indonesia, which would then be sent to the United States.

THE WAYS, MANNER, AND MEANS OF CONSPIRACY

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

3. It was part of this conspiracy for defendant DREXEL VENERO and coconspirators to administer a private online chat group and be a member of other private online chat groups (“Groups”) on an encrypted messaging platform, the purpose of which was to fund, view, distribute, and promote animal crush videos depicting, among other things, the torture, murder, and sadistic mutilation of animals, specifically, juvenile and adult monkeys.

4. It was part of this conspiracy for defendant DREXEL VENERO and coconspirators to collectively fund the creation of animal crush videos using online payment applications.

5. It was part of this conspiracy for coconspirators outside of the United States to receive this funding and use it to procure recording devices and animals for the creation of animal crush videos.

6. It was part of this conspiracy for coconspirators outside of the United States, including adult and juvenile individuals, to torture, perform sadistic mutilation, and murder these animals and to video record such acts, thereby creating animal crush videos.

7. It was part of this conspiracy for coconspirators outside of the United States to transmit animal crush videos to coconspirators within the United States, some of whom were

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members of the Groups, who would then distribute them to the broader Groups, to include defendant DREXEL VENERO.

OVERT ACTS

In furtherance of this conspiracy, and to effect and accomplish its objectives, defendant DREXEL VENERO and other coconspirators committed one or more of the following overt acts:

8. Beginning on an unknown date but no later than October 2021, and continuing through at least on or about July 2022, defendant DREXEL VENERO received via electronic payment methods approximately 100 electronic payments over the Internet from coconspirators, including CC14, and sent money to coconspirators CC12 and CC1 for the purposes of funding, among other things, payments to animal crush videographers that lived outside of the United States, including Indonesia, to create new animal crush videos.

9. CC1, CC13, and others had direct communications with CC11 in Indonesia. CC11 lived in Indonesia and hired the videographers to create new animal crush videos to send to the coconspirators. CC1, CC13, and others routinely directed and paid CC11 for the creation of animal crush videos from the funds they received from other coconspirators. CC1, CC13, and others would direct the videographers how to torture the animals in the videos.

10. In January 2022, VENERO contacted the Federal Bureau of Investigation (FBI) via the tip line to report individuals involved with the torture of animals. In the report, VENERO claimed, after being involved in the activity for months, he was able to “infiltrate” the animal abuse community because no one else cared and was currently being elevated to the group’s main administrator. Sometime thereafter, VENERO was interviewed by an FBI agent regarding his tip line report. During the interview VENERO stated he became aware of the animal abuse

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community in or about June 2021. During his initial activity, VENERO stated he and another user created a group on multiple online platforms where users could discuss the animal torture, as well as pay to get new material made utilizing a videographer known to VENERO and his partner. VENERO stated his group grew to 180-200 members. VENERO stated his relationship with the videographer eventually dissolved leaving him without access to new material. VENERO stated in approximately February 2022, he encountered CC1 who was establishing a separate group dedicated to the same activity. CC1 also claimed to have access to a different videographer. VENERO stated that, in or about March 2022, he also encountered another group administrator identified as CC12. VENERO stated he sent CC12 money for content. In total, VENERO claimed to have obtained 860 videos depicting monkey crushing and torture during the course of his activities.

11. VENERO provided copies of captured text messages between himself and others involved in the discussion of animal abuse to a Non-Governmental Organization involved in stopping animal abuse. He also provided the content to a Homeland Security Investigations office investigating CC1. A review of the captured chats revealed several days' worth of communications between VENERO and CC1. During communications on April 23, 2022, VENERO discusses a monkey torture video he would like to get made on behalf of his online group. He provided a "wish list" of torture:

VENERO: We want this monkey
If possible
1) Hammer arms, hands, fingers, legs feet, toes on a hard surface like concrete until flat as possible
Smash the balls and dick of monkey with hammer
2) pull teeth
3) rubbing alcohol sprayed into mouth
4) cut off eyelids
5) c clamp to head tightened slowly until dead

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CC1 The little one is gone

12. The conversation continued on April 24, 2022:

VENERO FUCK
 Dude how many clients does this guy have?
 Sigh
 Just anyone of the males will do at this point
 Make at least it's a friendly one not one that's already super scared
 Yes [CC1] I'm this fucked up lmao

CC1 Lol he's ready whenever you are

VENERO Cool so 175 still?

13. On April 24, 2022, VENERO sent CC1 \$175 using an online payment service. On April 25, 2022, CC1 provided the videos depicting VENERO's request to VENERO within the chat. Specifically, the video clips depict a person hammering the monkey's limbs and genitalia, crushing the monkey's head with a c-clamp, and other acts of torture.

14. A review of additional chats revealed requests by VENERO for additional videos. In total, VENERO sent \$820 he had collected from members of his group to CC1 in April and May 2022. The money VENERO sent to CC1 was then sent to CC13, who in turn sent the money to CC11.

15. In addition, between in or about March 2022 and July 2022, CC1 sent numerous additional payments to CC13 totaling over \$2,200 for the purposes of funding payments to the animal crush videographers that lived in Indonesia to create new animal crush videos and send the videos to him and others.

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16. In a March 21, 2022, in a chat with VENERO and CC12, CC12 offered to give VENERO access to his animal crush collection for \$75. That same day VENERO sent CC12 \$75.

17. CC12 encouraged more donations to CC1 by stating:

Our group is allowed to give [CC1] donations for her videos per the agreement her and I have between our two groups. She has my permission to put up her cashapp and PayPal info. She delivers great content to us. So feel free to donate to her. All I ask, is whoever does private message me with the amount you donated so I can keep track for our group. Thank you family.

18. CC12 lived in the Eastern District of Virginia during the conspiracy and participated in the conspiracy during its duration therefrom, including receiving money from VENERO and sharing his video collection with VENERO while in the Eastern District of Virginia.

19. In June 2023, law enforcement seized CC1's electronic devices. CC1's electronic media and accounts contained over 675 videos and 11,000 images depicting animal crushing including the above-described videos depicting the torture of the juvenile monkey as requested by VENERO.

20. The distribution and creation of the videos necessarily utilized applications and electronic media that used the Internet. The Internet is an interconnected network of computers with which one communicates when on-line, is a network that crosses state and national borders, and is a facility of interstate and foreign commerce.

21. The defendant knew that the videos described herein and other images involved in this conduct were obscene.

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22. The defendant's participation in the events described was undertaken knowingly, intentionally, and unlawfully, and not as a result of an accident, mistake, or other innocent reason.

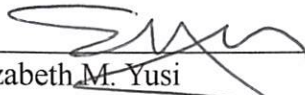
23. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case, nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: 12/12/24

By:


Elizabeth M. Yusi
Assistant United States Attorney


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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, DREXEL VENERO, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


DREXEL VENERO

I am DREXEL VENERO's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Booth Ripke, Esq.
Counsel for Defendant


James P. Buccola (47)

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